

No 4961 Equity

Maria Pusey, William J Martin
and Catharine Martin his wife
William Foyell and Sarah Foyell
his wife, Frederick Most and Mary
Most his wife

In the Circuit Court for Frederick County
sitting as a Court of Equity

vs
Emma L Pusey, George Thomas Pusey
and Johnson Jackson Pusey &
Frederick Hankey

To the Honorable the Judges of said Court

Your Orators Complain say:

1st Thomas Pusey late of Frederick County died intestate about December 1880. Seized and possessed of a tract or parcel of land situated in Frederick County, containing twenty one acres three rods and thirty one perches, more or less, and being the same conveyed to him by two deeds of Conveyance one from Elizabeth Baumgardner and the other from Saml Deitler, certified Copies of which are filed herewith marked Exhibits Nos 1 & 2 and which with all other Exhibits herewith filed are prayed to be taken as part of this bill of Complaint as if here inserted in words and figures

2nd That said Thos. Pusey died leaving your Oratrix Maria Pusey as his widow and the following as his only children and heirs at law, viz:

1st Your Oratrix Hannah Catharine, a daughter who is an adult and lives with her said husband William J Martin in Frederick County

2nd Your Oratrix Sarah Foyell, a daughter who is an adult and lives with her husband William Foyell in Washington County

3rd Your Oratrix Mary Most, a daughter, who is an adult and lives with her husband Frederick Most in Frederick County.

4th Johnson J Pusey, a son, who was an adult and lived with his wife Emma L Pusey in the State and City of New York.

5th That believing it to be to the interest of all parties concerned for said real estate to be sold, your Oratrix Maria Pusey, with the Consent and by the authority of said heirs at law contracted with Frederick Hankey, for the sale of said real estate to him at and for the sum of Twenty one hundred dollars and the said Frederick Hankey in part performance of such purchase paid in part thereof the sum of One hundred dollars.

6th That before said sale could be fully consummated the said Johnson J Pusey died intestate leaving said Emma L Pusey as his widow and George Thomas Pusey and Johnson Jackson Pusey as his only children and heirs at law.

7th That said George Thomas Pusey and Johnson Jackson Pusey are both infants of tender age and both reside with their said Mother in the said City and State of New York

8th That it would be to the interest and advantage of all parties in interest infants as well as Adults for said real estate to be sold and the proceeds divided among them.

9th That said real estate is not susceptible of advantageous division among all of said parties in interest

10th That the said sum of Twenty one hundred dollars is a fair and reasonable price for said real estate, and as much as it can reasonably be expected can be obtained for the same, and it would be to the interest and advantage of all parties concerned for said sale to be ratified and confirmed by your Honorable Court and